



Lead Acid Batteries Workshop Introduction

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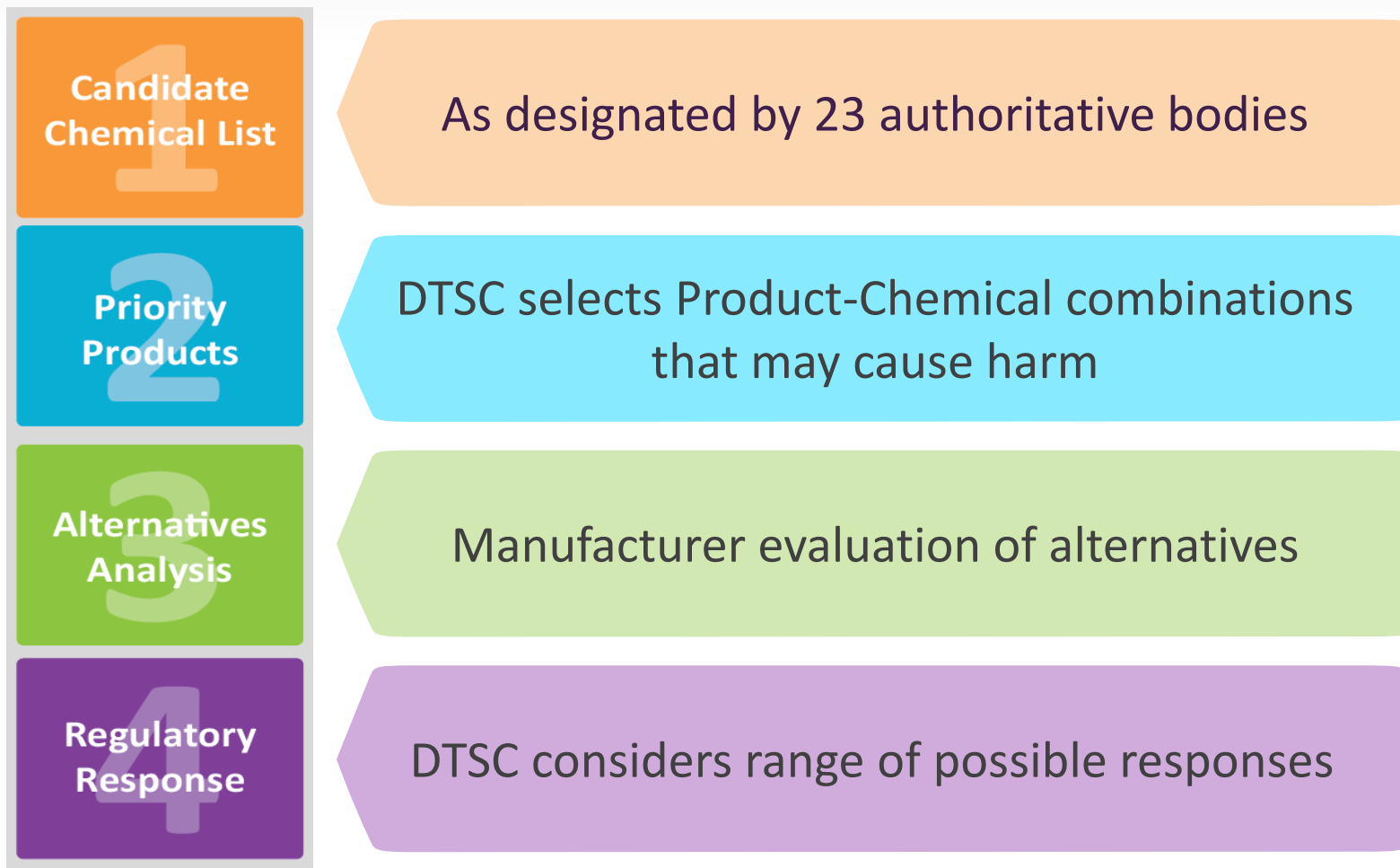
Cal/EPA

Safer Consumer Products Key tenets

- Avoid regrettable substitutes
- Not command and control – manufacturer responsibility
- Enforceable
- Incentivize innovation and the search for safer alternatives
- Transparent and science-based decision making



Safer Consumer Products framework



Selecting Product-Chemical Combinations

Product

(Product-ChemicalCombinations)

2 Priority Product

Potential exposure to the Candidate Chemicals in the product

AND

Potential for exposures to contribute to or cause **significant or widespread adverse impacts**

- People, aquatic, avian or terrestrial animals or plants
- Entire product life cycle of considered
- Products adopted through rulemaking
- Consider other regulatory protections



Regulatory programs

- RCRA universal waste:
 - Disposal prohibited
 - Recycling required

EU restrictions

- Annex 2 to the End-of-Life Vehicles Directive, 2000/53/EC
 - General prohibition against lead in vehicles
 - New revision planned for 2021
- Batteries Directive (2006/66/EC) – mercury and cadmium
- Harmonization between these two

SCP must “meaningfully enhance protection of public health and/or the environment.”



Alternatives Analysis

(Industry Step)

3

Alternatives Selection


Key Concepts

- Manufacturer evaluation
- Public comment
- CBI protections
- Life Cycle Thinking

Factors to be considered:

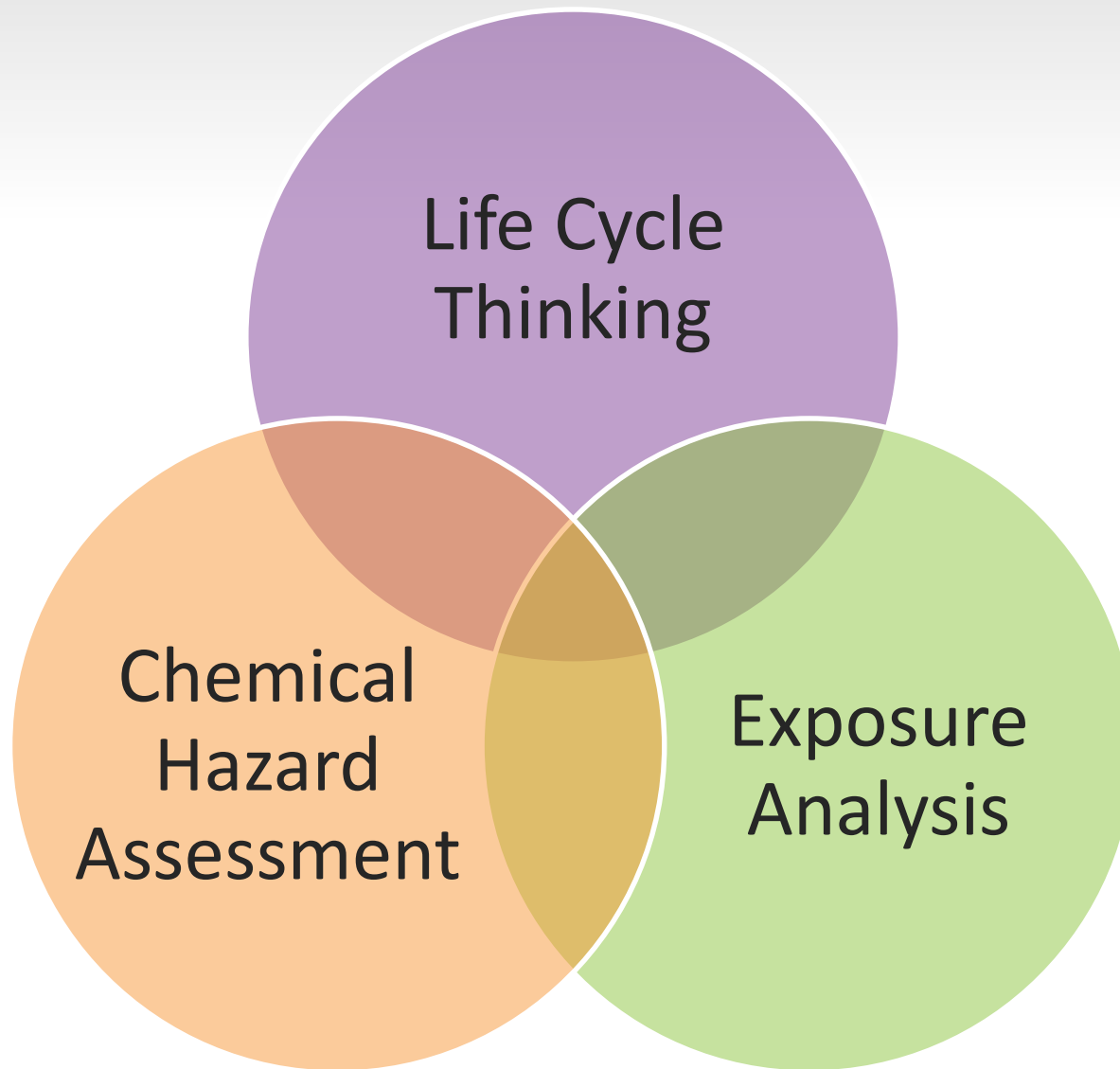
- Adverse environmental impacts
- Adverse public health impacts
- Adverse waste and end-of-life effects
- Environmental fate
- Materials and resource consumption impacts
- Physical chemical hazards
- Physicochemical properties
- Associated exposure pathways and life cycle segments

Alternatives Analysis

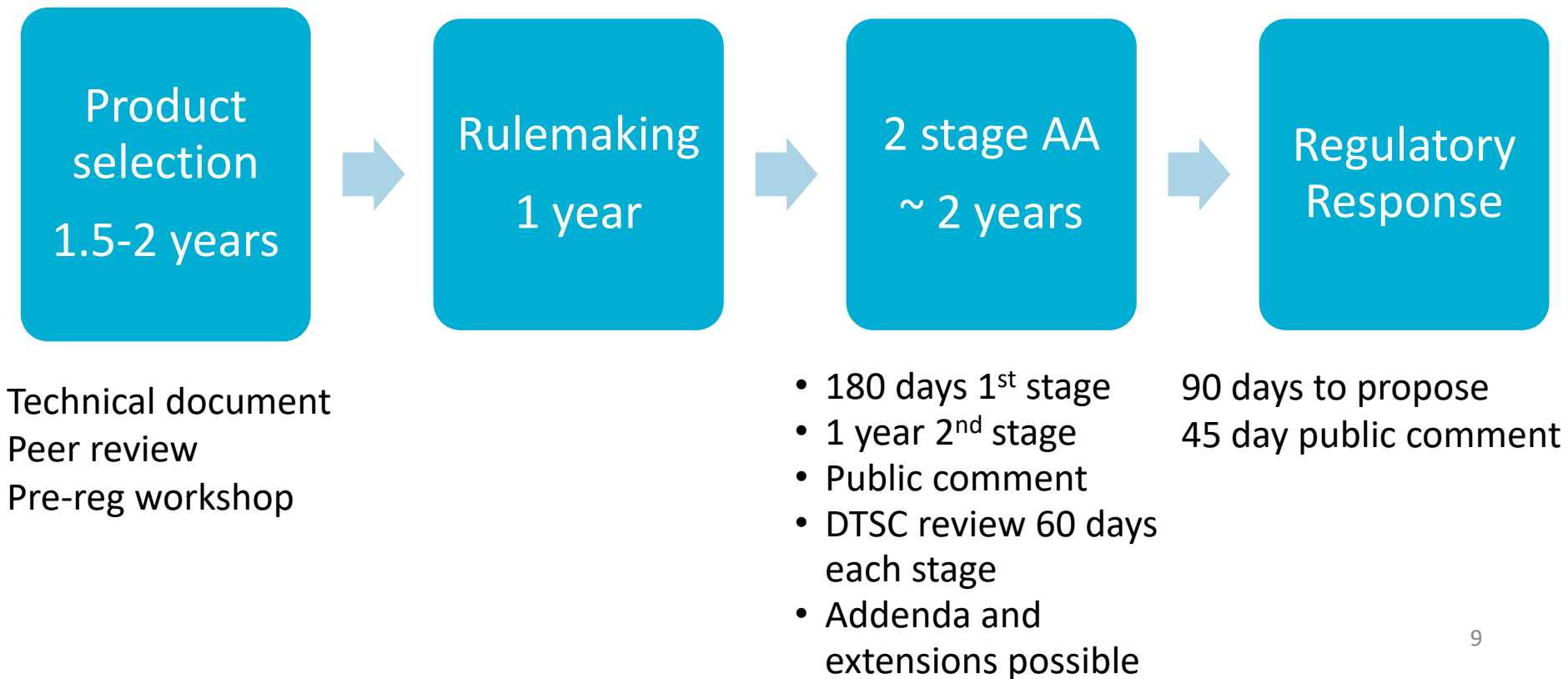


What are the trade offs?
What information is available?
What are the data gaps?
What will meet the performance criteria?
Does this alternative have a downside?





SCP timeline overview



4 Regulatory Response

- No response
 - Additional information to DTSC
 - Product information to consumer
 - Engineering or administrative controls
 - Restrictions/Prohibitions on sales
 - End-of-life product stewardship
 - Research funding
- Close data gaps
- Consumer awareness and choice
- Reduce exposures
- Reduce hazards & exposures
- Reduce hazardous waste.
- Innovate

